

STATEMENT OF BASIS (AI No. 18918)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0080101 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: St. John Fleeting, Inc
P.O. Box 96
Garyville, LA 70051

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Molly McKean

DATE PREPARED: December 14, 2007

1. PERMIT STATUS

A. Reason For Permit Action:

Permit reissuance of an Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. NPDES permit - NPDES permit effective date: N/A
NPDES permit expiration date: N/A

C. LPDES permits – LA0080101
LPDES permit effective date: February 1, 2003
LPDES permit expiration date: January 31, 2008

D. Date Application Received: December 7, 2007

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY - barge cleaning and repair

This facility is 20% repair and 80% cleaning of open-top, dry-cargo barges on the Mississippi River. Barges are dry cleaned before arrival at the site. They are broom cleaned and washed with river water. No cleaning agents are used and water is then returned to the river. They clean approximately 4 "grain product" barges per day and 2 "other product" barges per month. Barges may contain one of the commodities listed in Attachment A. The facility has a land-based office and containment area for diesel and oil storage.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II As per LAC33:IX.1319 Table 1 and SIC Code 4463 *
3. Wastewater Type: II
4. SIC code: 4491, 3731

* -In Appendix A Section IV (Relation of 1987 to 1977 Industries) of the Standard Industrial Classification Manual, SIC Code 4491 is equivalent to previous SIC Code 4463.

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C. LOCATION - river batture at the intersection of LA Hwys 44 & 54 at M.P. 141.6, Garyville, St. John Parish

Latitude 30° 02' 11", Longitude 90° 36' 55"

3. OUTFALL INFORMATION

Outfall 001

Discharge Type: dry commodity hopper barge washwater
 Treatment: none
 Location: at the point of discharge from the barge/ship being washed
 Flow: intermittent
 Discharge Route: to the Mississippi River

Outfall 002

Discharge Type: coal and coke hopper barge hold washwater
 Treatment: none
 Location: at the point of discharge from the barge/ship being washed
 Flow: intermittent
 Discharge Route: to the Mississippi River

Outfall 003

Discharge Type: treated sanitary wastewater
 Treatment: package treatment plant
 Location: at the point of discharge from the STP prior to mixing with other waters
 Flow: 100 GPD
 Discharge Route: to the Mississippi River

Outfall 004

Discharge Type: treated sanitary wastewater
 Treatment: package treatment plant
 Location: at the point of discharge from the STP prior to mixing with other waters
 Flow: 100 GPD
 Discharge Route: to the Mississippi River

Outfall 005

Discharge Type: treated sanitary wastewater
 Treatment: package treatment plant
 Location: at the point of discharge from the STP prior to mixing with other waters
 Flow: 100 GPD
 Discharge Route: to the Mississippi River

Outfall 06A

Discharge Type: incoming ballast and void water from customer barges
 Treatment: none
 Location: at the point of discharge from the customer barge wing/void tanks

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Flow: intermittent
Discharge Route: to the Mississippi River

Outfall 06B

Discharge Type: maintenance ballast and void water
Treatment: none
Location: at the point of discharge from the work barge wing/void tanks
Flow: intermittent
Discharge Route: to the Mississippi River

4. RECEIVING WATERS

STREAM - Mississippi River

BASIN AND SEGMENT - Mississippi River Basin, Segment 070301

DESIGNATED USES -

- a. primary contact recreation
- b. secondary contact recreation
- c. propagation of fish and wildlife
- d. drinking water supply

5. TMDL STATUS

The discharges from St. John Fleeting, Inc are to the Mississippi River, Subsegment 070301 of the Mississippi River Basin. Subsegment 070301 is not listed on LDEQ's Final 2004 303(d) List as impaired, and to date no TMDL's have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

6. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

7. COMPLIANCE HISTORY/COMMENTS

1. Inspections

10/10/05 – Status inspection following Hurricane Katrina. Facility was operational.

2. DMR Review/Excursions –

Date	Parameter	Outfall	Reported Value	Permit Limits
6/06	TSS	003	66 mg/l	45 mg/l

DMRs from the previous two years (back to 1/06) were reviewed. All DMRs were submitted and only one permit violation was noted.

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8. EXISTING EFFLUENT LIMITS

Outfall 001 - Dry commodity barge washwater (No effluent limitations are published for wash waters from barges previously containing products listed in attachment I. Standard BMPs for barge operations were included in Part II conditions)

Outfall 002 – Coal and Coke barge washwater

Effluent Characteristic	Monthly Average (mg/L)	Daily Maximum (mg/L)	Measurement Frequency
Flow	Report	Report	1/week*
COD	250	400	1/week*
TSS	Report	Report	1/month*
pH (min/max)	6.0 su (min)	9.0 su (max)	1/week*

* - when discharging

Outfalls 003, 004, 005 – treated sanitary wastewater

Effluent Characteristic	Monthly Average (mg/L)	Weekly Average (mg/L)	Measurement Frequency
Flow	Report	Report	1/6 months
BOD ₅	---	45	1/6 months
TSS	---	45	1/6 months
Fecal Coliform colonies/100 ml	---	400	1/6 months
pH	6.0 su (min)	9.0 su (max)	1/6 months

Outfall 06A – Customer barge void and ballast wastewater

Outfall 06B – Maintenance void and ballast wastewater

Effluent Characteristic	Monthly Average (mg/L)	Daily Maximum (mg/L)	Measurement Frequency
Flow	Report	Report	1/week
COD	---	250	1/week
Oil and Grease	---	15	1/week
pH	6.0 su (min)	9.0 su (max)	1/week

CHANGES FROM EXISTING PERMIT

Storm Water Pollution Prevention Plan requirements have been added to Part II.

9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 070301 of the Mississippi River Basin, has been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for the Pallid Sturgeon, which is listed as an endangered species. LDEQ has not submitted this draft permit to the FWS for review in accordance with a letter dated October 24, 2007 from Boggs (FWS) to Brown (LDEQ). As set forth in the Memorandum of Understanding between the LDEQ and the FWS, and based on information provided by the FWS, LDEQ has determined that the issuance of the LPDES permit is not likely to have an adverse effect upon the Pallid Sturgeon. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

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10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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Rationale for St. John Fleeting, Inc

1. **Outfall 001:** dry commodity hopper barge hold washwater

Based on BPJ and on permits for similar facilities, no effluent limitations are established for washwaters from barges previously containing dry commodities listed in Attachment A. Best Management Practices (BMPs) for barge operations are listed in Part II.

2. **Outfall 002:** coal and coke hopper barge ship hold washwater

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg: Daily Max (mg/l)	<u>Reference</u>
Flow-MGD	Report: Report	LAC 33:IX.2701.1.1.b
COD	250:400	Similar Discharges; BPJ
TSS	Report: Report	Similar Discharges; BPJ
pH	6.0 - 9.0 s.u.	Similar Discharges; BPJ

BPJ Best Professional Judgment

Treatment: none

Monitoring Frequency: TSS shall be observed once per month and Flow, COD and pH shall be observed once per week at the point of discharge from the barge being washed.

Limits Justification: Limits and Monitoring Frequency are based on current guidance for similar discharges from other facilities and the previous permit.

3. **Outfall 003:** treated sanitary wastewater **Outfall 004:** treated sanitary wastewater **Outfall 005:** treated sanitary wastewater

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg: Weekly Avg (mg/l)	<u>Reference</u>
Flow (GPD)	---: Report	
BOD	---:45 mg/l	Similar discharges (BPJ)
Fecal Coliform Colonies/100 ml	---:400 mg/l	Similar discharges (BPJ)
TSS	---:45 mg/l	Similar discharges (BPJ)
pH	6.0 - 9.0 su	Similar discharges (BPJ)

Treatment: package treatment plants

Monitoring Frequency: Semiannually for all parameters at the point of discharge from the STP prior to

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combining with any other waters.

Limits Justification: Limits and monitoring frequencies are based on current guidance for similar discharges from other facilities and the previous permit.

4. **Outfall 06A:** incoming ballast and void water from customer barges
Outfall 06B: maintenance ballast and void water

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Daily Max (mg/l)	<u>Reference</u>
Flow-MGD	Report:Report	LAC 33:IX.2701.1.1.b
COD	---:250	Similar Discharges; BPJ
Oil and Grease	---:15	Similar Discharges; BPJ
pH	6.0 - 9.0 s.u.	Similar Discharges; BPJ

BPJ Best Professional Judgment

Treatment: none

Monitoring Frequency: Flow, COD, Oil & Grease and pH shall be observed once per week at the point of discharge from the incoming customer barge/vessel.

*The measurement frequency for Outfall 06B for the discharge of maintenance ballast and void water shall be 1/month whenever sampling is required.

Limits Justification: Limits and Monitoring Frequency are based on current guidance for similar discharges from other facilities and the previously issued permit.

This facility is not subject to Effluent Limitations Guidelines for Transportation Equipment Cleaning, 40 CFR Part 442, because, in accordance with 40 CFR 442.1.a, "this part applies to discharges resulting from cleaning the interior of tanks used to transport chemical, petroleum or food grade cargos." This facility does not clean tanks. Only open top hopper barges and ships are cleaned.

Storm Water Pollution Prevention Plan (SWP3) Requirement

A SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water discharges shall not be required to obtain an LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.a-k, facilities classified as SIC code 4491, 3731 are considered to have storm water discharges associated with industrial activity.

The SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see Part II of the permit).